

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

RE: JORI PLUNKETT)	Case No. 17 B 26472
)	
)	Chapter 13
Debtor(s))	
)	Judge: JACQUELINE P COX

NOTICE OF MOTION & CERTIFICATE OF SERVICE

JORI PLUNKETT
1325 S. KEDZIE AVE #304
CHICAGO, IL 60623

THE SEMRAD LAW FIRM LLC
via Clerk's ECF noticing procedures

Please take notice that on November 15, 2021 at 9:00 am., I will appear before the Honorable Judge JACQUELINE P COX or any judge sitting in the judge's place and present the motion set forth below.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, (1) use this link: <https://www.zoomgov.com> (2) Enter the meeting ID 1612732896. (3) Enter the passcode 778135.

To appear by telephone, (1) call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. (2) Enter the meeting ID 1612732896. (3) Enter passcode 778135.

When prompted identify yourself by stating your full name.

To reach Judge Cox's web page go to www.ilnb.uscourts.gov and click on the tab for Judges.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on September 22, 2021.

/s/ M.O. Marshall

M.O. Marshall, Trustee

Chapter 13 Trustee
55 East Monroe, Suite 3850
Chicago, IL 60603
(312) 294-5900

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**MOTION TO DISMISS
FOR FAILURE TO TURNOVER TAX RETURN TO TRUSTEE**

Now comes M.O. Marshall, Trustee and requests that this case be dismissed pursuant to 11 U.S.C. §1307(c), and in support thereof respectfully states the following:

1. Debtor(s) filed the above captioned case on September 01, 2017.
2. The debtor(s) plan confirmed on October 30, 2017, provided for tax returns to be turned over to the trustee each year.
3. The Trustee has not received the tax return or transcript for 2020.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this Court deems just and proper.

/s/ M.O. Marshall

M.O. Marshall, Trustee

Chapter 13 Trustee
55 East Monroe, Suite 3850
Chicago, IL 60603
(312) 294-5900